VpAC Vibrio Rule Development Meeting
July 29, 2014

Attendees

Purpose

The purpose of the Vibrio parahaemolyticus Advisory Committee (VpAC) is to work with the Department of Health to provide recommendations for consideration in future rule making regarding the Vibrio control plan set forth in WAC 246-282-006. The Department of Health will draft rule language that will be provided to the State Board of Health for review. The State Board of Health has the responsibility of approving any changes or modifications to the WAC, which may or may not include recommendations put forth by the committee.

Meeting Notes

Procedural:

- Main purpose of this meeting was to review the proposed draft language and discuss areas where clarifications or revisions are needed.

Proposed Draft Language general comments:

- Waiver process:
    - Intended to cover practices that meet the intent of parts of the rule, not an outright exemption to the rule
        - A company not being associated with historical illnesses would not qualify for an exemption from the control plan, the risk categories are by growing area so a company would need to abide by the category/couldn't drop to a lower category because they haven't had illnesses
    - The burden of scientific proof for the exemption would depend on the type and extent of request
    - Do not need to re-submit each year if the practice has not changed
    - Do not anticipate a cost associated with the waiver like the LOSS process
    - Intent is to allow for innovation and encourage practices that reduce risk of illness, provide options to meet the end goals of the control plan
- Risk categorization:
    - Confirmed that a case must meet all of the criteria to be included in the risk categorization count
    - Underlying conditions are not a criteria included in the process
    - Concern that a growing area could end up in level 3 just because they harvest a large volume, which is a shortfall to the attribution but without landings data it is not possible to quantify production levels
    - Concern that all of the illnesses from a growing area may come from one company, did look at the past five years and that was only the case in one or two of the areas and they had pretty low illness numbers
- Temperature logistics:
    - It seems backwards, it should be that you don't harvest on 90 F days but that the time to temperature is shorter when the water temperature is higher, it would be better to reduce the amount of time to 50 F rather than using a closure

        - Could have more options in plan, if water temperature is x or air temp is y then there is a z hour reduction
        - Know that high water temps mean that there is likely less ability to purge Vibrio since there are higher levels in water, reach certain scenarios and it is not safe to harvest
    - How would companies take temperatures
        - To go out, test tissue temperatures once you go out, and then send everyone home sounds like a waste of money
        - Who is going to take temperatures? No one has time and they would need to hire someone just to take temperatures
        - Could the temperatures be taken the day before or a few hours before harvest so that a crew doesn't have to go out and come back if it is over temp?
        - Is there a consistent way to monitor temperatures from a station?
        - Do need to work out the logistics for this piece, it has been a topic for discussion at most meetings and we've been talking about it for a year and all agreed last July that it is the right direction
    - Areas could end up being closed all the time, since 67 F is very common
        - Would be closures, but tradeoff for mid-season closures in July and August that prevent illnesses rather than late season closures
    - Can there be an option for rapid cooling if temperatures are above the closure?
        - Still an issue of whether there are scenarios where post-harvest handling doesn't matter, the load coming out of the water will cause illness, intent of the closures is to reduce those illnesses
    - Water temperatures can change really quickly, the data don't trend well enough together in order to make predictions; there needs to be a better way to predict temperatures
        - More pictures would help, get some data together to make graphs
        - Reason DOH requested growers take water temperatures, DOH is not there at time of harvest, but needs that data to create the graphs and visualize the impacts
        - Some areas the temps change rapidly, many they don't, you see it rising and you take precautions/revise your harvest plans
    - We've already been down this road before, we talked a year ago about how water temperatures matter the most
    - How does the weekly *tlh* work into this?
        - Would still have *tlh* closures
    - It is a lot of data collection, what is the purpose?
        - Need the data collection to document compliance, it is not just for research but the documentation and evidence that you're meeting the control plan
- How is wet storage being addressed
    - Covered under the MO, does not need to be in the control plan

Specific revisions and comments:

- 3d: define ambient or take it out
- 13: Since containerization may occur a few days before harvest, should the air temp be taken the day before harvest?
    - May be too confusing, cumbersome to go out the day before just to take a temperature
    - Could have temperature at time of harvest, if anyone else can harvest when the day before was really hot why is this harvest practice different?

    - For submerged intertidal it doesn't matter when you put the oysters in the tubs if you're just going to pick it up the next day, it would be the same as if you were doing intertidal harvest—the oysters are just in containers rather than directly on the tide flat for the day
- 13: Could intertidal exposed harvesters take water temperature instead?
    - Possibly, VpAC wanted tissue temperature because the water may be too far out/not representative. We could re-look at this and have it be tissue or water based on the harvest plan
- 18b: if you typically have bagged oysters on the beach why do you have to disperse them in this situation?
    - Not enough evidence on how this practice affects Vibrio, so may not need to require disbursement

Risk assessment update:

- Developed size class distributions for x-small, small and medium oysters
    - Adding in specialty oysters soon
- Improved the cool down portion of the model using the raw data from an ISSC cooling study
    - Taylor did some cooling studies, but not sure if the raw data is still available
    - Sprinkler/mist in cooler leads to much faster cooling times than refrigeration alone
- Have user guides developed for the model and templates to easily add landings data when it is available

Landings Solutions Committee update:

- WDFW is interested in working together to have an updated system, move towards an online reporting option, improve the system
    - Currently tied to an industry tax based on landings, which is not tenable to the industry
- Reached out to Dept of Ag, do not have capabilities for this sort of collection
- Could it be added to the new DOH harvest database?
    - Would be additional work to the system, unlikely to occur due to other pressures on IT resources and costs associated with additions to system
- Should be a national database created/maintained by FDA or ISSC, currently the requirement for landings is an unfunded mandate in the MO
    - If we want national collection, consistency and comparability, one system would make sense

Next steps:

- DOH:
    - Refine proposed draft language based on meeting
- Industry members:
    - Collect temperature data and share with DO
    - Miranda: convene a Landings Solutions Committee